

Return Date: 24-1UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

68 BURNS NEW HOLDINGS, INCCase No. 24-45157-NHL

Debtor(s)

Chapter 11

NOTICE OF MOTION

PLEASE TAKE NOTICE, a hearing will be held at the U.S. Bankruptcy Court for the Eastern District of New York, 271-C Cadman Plaza East, Brooklyn, New York 11201-1800 before the

Honorable JUDGE LORD, United States Bankruptcy Judge, to consider the motion for an order granting relief as follows: THE RELATIONSHIP BETWEEN A LAWYERTO A CLIENT IS NOT A OPEN ONE, EVEN WHILE THE
LAWYER ACT WRONGLY AND/OR UNFAIRLY.PLEASE SEND THE EXHIBITS.THEREFORE, I WILL REQUEST THAT MY PETITION TO REMOVE
MR. JULIO PORTILLA FROM MY CASE SHOULD NOT BE A
SUBJECT FOR ANY CREDITOR, ONLY FOR THE COURT.Date of hearing: 7/20/2025 Time: 3 PM*Parties may appear by phone or video conference.*

*All hearings before Judge Lord are held by phone or video. Parties will receive hearing instructions after completing registration on eCourt Appearances.

Register for Hearing: All parties must register 2-3 days prior to hearing on eCourt Appearances at <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>.

Responsive papers shall be filed with the bankruptcy court no later than seven (7) days prior to the hearing date set forth above.

Dated: 6-20-2024Signature: [Signature]Print name: GIDEON RAVIVAddress: 70-25 YELLOWSTONE BLVD
ROXBOROUGH, NY 11375Phone: 718 268 6928Email: GIDEON1818@HOTMAIL.COM

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

68 BURN NEW HOLDINGS, INC

Case No. 24 45157 NHL

Debtor(s)

Chapter 11
-----X

APPLICATION IN SUPPORT OF MOTION

TO THE HON. JUDGE LORD, Bankruptcy Judge

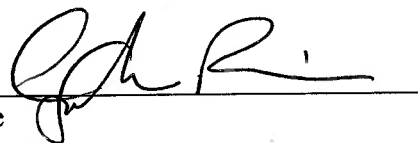
The undersigned makes this application in support of my motion for the relief stated in the Notice of Motion. In support of this motion, I hereby allege as follows:

ATTACHED MY MOTION TO CANCEL MR JULIO PORTILLA
ESQ AS OUR BANKRUPTCY LAWYER, BECAUSE THAT
HE MISLEAD US, DID NOT DO ANY WORK
AND HE PUT US WITHOUT ANY LEGAL REPRESENTATION.
IN SUCH EVENT, WE ARE NOT COVER WITH ANY
LEGAL REPRESENTATION, AND WE NEED TO REPLACE
HIM AS SOON AS THE COURT WILL ALLOW US TO
DO SO.

Wherefore, Applicant prays for an Order granting the relief requested.

Dated: 6-20-2024

Signature



UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

68 BURNS NEW HOLDINGS, INC

Case No. 24-45157-NAL

Debtor(s)

Chapter 11
-----X

CERTIFICATE OF SERVICE

The undersigned certifies that on _____, a copy of the annexed Motion was served by depositing same, enclosed in a properly addressed postage-paid envelope, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York, upon *[below specify the name and mailing address of each party served]*:

Dated: _____

Signature